



Global Operations, Environment, Health & Safety

1 Plastics Avenue
Pittsfield, MA 01201

Transmitted Via Electronic Mail

August 14, 2018

John Ziegler
Massachusetts Department of Environmental Protection
Western Regional Office
436 Dwight Street
Springfield, MA 01103

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-North (GECD140)
Revised Grant of Environmental Restriction and Easement – Post-Work Notification
Building 100 Utility Emergency Repair Project**

Dear Mr. Ziegler:

On May 17, 2018, the General Electric Company (GE) provided notice to the Massachusetts Department of Environmental Protection (DEP) of an emergency excavation necessary to repair a damaged fire protection line. The notice was associated with the Revised Grant of Environmental Restriction and Easement (the Revised Grant) for Tax Parcel No. J10-9-2 in Pittsfield, Massachusetts (the Property), which is part of East Street Area 2-North within the GE-Pittsfield/Housatonic River Site. The emergency activity involved the repair of a damaged subsurface fire protection line service to Building 100, including the excavation of existing soils to access the damaged section of pipeline.

The Revised Grant requires that, following the completion of an emergency activity, the Grantor (GE) must provide a written opinion and completion report, using Exhibit F “Post-Work Notification Form for Property with ERE Grant” (Post-Work Notification Form). This letter provides a summary of the work that was performed following the May 17, 2016 notice, and a copy of the Post-Work Notification Form is provided as Attachment A.

Restoration Plan

As outlined in GE’s notification and email correspondence, GE initiated repair activities at the Property on May 18, 2016. Excavation activities were conducted in the roadway immediately south of Building 100. Work was performed within an area identified as an “Other Ground Cover Feature” in the Revised Grant. After the fire protection line was isolated and drained to the extent practicable from nearby hydrants, excavation commenced. The surface soils in the vicinity of the water main break were displaced by the discharged water, and subsequently swept up for offsite disposal. Excavation of soil deeper than 1-foot continued until the twelve-inch diameter ductile iron fire protection pipe was uncovered at approximately six feet below existing ground surface. The damaged section of pipe was removed and replaced.

Final excavation dimensions were approximately 8 feet long (parallel to Building 100), 6 feet wide, and 7 feet deep, equating to approximately 13 cubic yards of excavated material. Figure 1 shows the location and orientation of the completed excavation. The excavation was subsequently backfilled, first with soil that was excavated from below one foot. This material was generally replaced in the same depth increment from which it was excavated. Imported clean soil was used to restore the uppermost one foot. The excavation area was then paved with new asphalt on May 23, 2018.

Waste Materials

Waste materials generated during the work included approximately 3 cubic yards of soil, asphalt, and concrete removed from the excavation area (approximately the top one foot) and a section of removed water pipe.

For disposal determination, GE utilized the sample results from proximal boring locations for this excavation. Based on review of the analytical results provided in Table 1, PCB concentrations ranged from non-detect to 12.6 parts per million (ppm) up to a depth of one foot. The Appendix IX+3 analytical results provided in Table 2 were reviewed using the "20 x" rule comparison to allowable x Toxicity Characteristic Leachate Procedure (TCLP) extract concentrations and there were no exceedances.

Based on the review of the PCB results and the determination that the soils are not RCRA hazardous waste by characteristic (based on the 20 x TCLP comparison), all waste materials were transported to the High Acres Landfill (Waste Management) located in Fairport, New York for disposal on July 9, 2018.

Conclusion

All work performed at the Property was in accordance with the measures identified in the Restoration Plan identified above and the applicable Provisions of the Revised Grant. Final restoration was performed in May 23, 2018. The Post-Notification Exhibit F is attached.

Should there be any questions or comments, or if additional information is needed, please contact me at 413-553-6614.

Sincerely yours,



Matthew Calacone
Senior Project Manager
Global Operations – Environment, Health and Safety

cc: Dean Tagliaferro, EPA (electronic)
Eva Tor, MADEP (electronic)
Chris Ferry, ARSC Primus (electronic)
Steve Karvazy, GE (electronic)
Andrew Silber, GE (electronic)
James Nuss, Arcadis (electronic)
GE Environmental Library (electronic)

ATTACHMENT A



EXHIBIT F

POST-WORK NOTIFICATION FORM FOR PROPERTY WITH ERE GRANT

I. General Information

Type of work: ☐ Surface (*top foot*) excavation of greater than five (5) cubic feet and less than or equal to ten (10) cubic yards (per Revised Grant Paragraph 4.A)

(*check all that apply*) ☐ Surface (*top foot*) excavation of any volume (per Revised Grant Paragraph 4.B)

☐ Subsurface (*deeper than top foot*) excavation of ten (10) cubic yards or less (per Revised Grant Paragraph 4.C)

☐ Surface or subsurface excavation for Utility Work (per Revised Grant Paragraph 4.D)

☒ Emergency excavation (per Revised Grant Paragraph 8)

Property Address: 1240 Tyler Street, Pittsfield, MA 01201

Tax Parcel ID: J10-9-2

II. Description of Excavation Activities

Start date of excavation/soil disturbance: May 18, 2018

End date of excavation/soil disturbance: May 23, 2018

Amount of soil excavated or moved: 13 cubic yards

Any soil or other excavated material moved out of the Restricted Area? ☒ Yes ☐ No

Excavation dimensions (*approximate length x width x depth, in feet*): 8 ft x 6 ft x 7 ft

Description of project (*attach extra sheets, if necessary*): Locate and repair broken fire protection line.

Final disposition of soil: (*attach bills of lading and certificates of disposals, if applicable*): Excavated soil was used to backfill the excavation. Imported clean soil and asphalt was used to finish the remainder of the excavation. Waste disposal manifest is attached.

Attach a plan (*e.g., a copy of the Plan of Restricted Area*) unless previously submitted – or if boundaries of any of the restricted areas have changed, a revised Plan of Restricted Area (if previously submitted, identify date submitted _____) – showing:

- (1) location of excavation(s) within the property
- (2) direction
- (3) major site features (*e.g., roads, buildings, edges of pavement/barriers, locations of utilities if known*)

Attach photographs of work area prior to work, during work and post-restoration work, if available (*optional*).

Was soil sampling and analysis conducted? ☐ Yes ☒ No

If Yes, attach analytical results and show sampling locations (*and indicate depths*) on an attached plan.

Were the Health and Safety Protocol and/or the Soil Management Protocol (as defined in the Revised Grant), if applicable, followed? (check each that applies¹) ☒ Health and Safety Protocol was followed
☒ Soil Management Protocol was followed
☐ Not Applicable

III. Additional Information for Emergency Excavation.

If work was conducted as an Emergency Excavation (see Paragraph 8 ("Emergency Excavation") of the Revised Grant):

- (1) Attach an opinion and completion report prepared by an appropriately trained and licensed professional (including copy of written plan for restoration).
- (2) Date and time property owner first obtained knowledge of the emergency: May 16, 2018
- (3) Date and time property owner provided oral notification of the emergency to DEP: May 17, 2018

IV. Signature

Two signatures are required (except for excavations pursuant to Grant Paragraph 4.A or the last paragraph of Revised Grant Paragraph 8, for which only the owner or person conducting the work must sign). The property owner, or person conducting the work if other than the property owner, and the Licensed Site Professional who has overseen the work (where required) must each complete and sign the statement, below.

Owner or person conducting the work if other than the property owner:

I, Matthew Calacone, to the best of my knowledge and belief, state that the material information contained in this submittal is true, accurate and complete.

By: Matthew Calacone

Signature: Matthew Calacone

Name/Title: Senior Project Manager – Global Operations – Environment, Health & Safety

Organization: General Electric Company

Address: 1 Plastics Avenue, Pittsfield, MA 01201

Telephone #: 413-553-6614

Relationship to site: Owner

Licensed Site Professional:

I, James M. Nuss, to the best of my knowledge and belief, state that the material information contained in this submittal is true, accurate and complete.

By: James M. Nuss

Signature: James M. Nuss

Name/Title: Senior Vice President

Organization: Arcadis US, Inc.

¹ See note 3 in Section V ("Notes About the Use of this Form"), below.

Address: One Lincoln Center, 110 West Fayette Street, Suite 300, Syracuse, NY 13202

Telephone #: 315-671-9230

Relationship to site: Licensed Site Professional

V. Notes About the Use of this Form

(1) This form is due no later than thirty (30) days after completion of the permitted activities and uses under Paragraph 4 ("Permitted Activities and Uses") of the ERE Grant. For emergency excavations pursuant to Paragraph 8 of the ERE Grant ("Emergency Excavation"), verbal notification is required as soon as possible but no more than two hours after learning of the emergency, and this form is for the post-emergency excavation notice and is due within ten (10) days after completion of the necessary restoration in accordance with Paragraph 8 of the Revised Grant.

(2) Separate, 15 days' advance written notice is required for Utility Work excavation activity, pursuant to Paragraph 4.D ("Surface and/or Subsurface Excavation for Utility Work") of the Revised Grant.

(3) The Health and Safety Protocol and the Soil Management Protocol do not apply to the Permitted Activities and Uses set forth in Paragraph 4.A ("Surface Excavation of Ten (10) Cubic Yards or Less") of the Revised Grant. These protocols also do not apply to the Permitted Activities and Uses set forth in Paragraph 4.B ("Surface Excavation of any Volume") of the Revised Grant, except for off-Property disposal, to which Paragraph 11 of the Soil Management Protocol applies.

VI. Where to Submit this Form

Submit this completed form, via certified mail, to: MA Department of Environmental Protection
Bureau of Waste Site Cleanup, Special Projects
436 Dwight Street
Springfield, Massachusetts 01103
(Attn.: *GE Housatonic Removal Action Project Manager*)

Submit a copy of this form, via certified mail, to: U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
(Attn.: *GE-Pittsfield/Housatonic River Site*)

TABLE 1
PRE-DESIGN INVESTIGATION SOIL SAMPLING DATA FOR PCBs

PRE-DESIGN INVESTIGATION REPORT FOR THE EAST STREET AREA 2 - NORTH REMOVAL ACTION
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth(Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
RAA5-I17	0-1	3/2/2004	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	5.2	7.4	12.6
RAA5-J18	0-1	1/27/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.13	0.29	0.42

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to CT&E Environmental Services, Inc. for analysis of PCBs.
2. With the exception of samples flagged with a* data has been validated as per Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts, Blasland Bouck & Lee, Inc. (approved November 4, 2002 and resubmitted December 10, 2002).
3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
4. Field duplicate sample results are presented in brackets.

Data Qualifiers:

J - Indicates that the associated numerical value is an estimated concentration.

TABLE 2
PRE-DESIGN INVESTIGATION SOIL SAMPLING DATA FOR APPENDIX IX+3 SOIL ANALYTICAL RESULTS

PRE-DESIGN INVESTIGATION REPORT FOR THE EAST STREET AREA 2 - NORTH REMOVAL ACTION
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: Sample Depth(Feet): Date Collected:	20 x TCLP Criteria -	RAA5-I17 0-1 03/02/04	RAA5-J18 0-1 01/27/04
Volatile Organics				
1,1-Dichloroethene		14.00	ND(0.0056)	ND(0.0056)
1,2-Dichloroethane		10.00	ND(0.0056)	ND(0.0056)
2-Butanone		4,000.00	ND(0.011)	ND(0.011)
Benzene		10.00	ND(0.0056)	ND(0.0056)
Carbon Tetrachloride		10.00	ND(0.0056)	ND(0.0056)
Chlorobenzene		2,000.00	ND(0.0056)	ND(0.0056)
Chloroform		120.00	ND(0.0056)	ND(0.0056)
Tetrachloroethene		14.00	ND(0.0056)	ND(0.0056)
Trichloroethene		10.00	ND(0.0056)	ND(0.0056)
Vinyl Chloride		4.00	ND(0.0056)	ND(0.0056)
Semivolatile Organics				
1,4-Dichlorobenzene		150.00	ND(0.37)	ND(0.38)
2,4,5-Trichlorophenol		8,000.00	ND(0.37)	ND(0.38)
2,4,6-Trichlorophenol		40.00	ND(0.37)	ND(0.38)
2,4-Dinitrotoluene		2.60	ND(0.37)	ND(0.38)
3&4-Methylphenol		4,000.00	ND(0.74) J	ND(0.76)
Hexachlorobenzene		2.60	ND(0.37)	ND(0.38)
Hexachlorobutadiene		10.00	ND(0.37)	ND(0.38)
Hexachloroethane		60.00	ND(0.37)	ND(0.38)
Nitrobenzene		40.00	ND(0.37)	ND(0.38)
Pentachlorophenol		2,000.00	ND(1.9)	ND(1.9)
Pyridine		100.00	ND(0.37)	ND(0.38)
Inorganics				
Arsenic		100.00	15.0	4.40
Barium		2,000.00	18.0 B	32.0
Cadmium		20.00	0.330 B	0.0870 B
Chromium		100.00	5.70	5.40
Lead		100.00	22.0	7.70
Mercury		4.00	0.0140 B	ND(0.110)
Selenium		20.00	ND(1.00) J	ND(1.00)
Silver		100.00	ND(1.00)	ND(1.00)

Notes:

1. Samples were collected by Blasland Bouck & Lee, Inc., and were submitted to CT&E Environmental Services, Inc. for analysis of Appendix IX+3 constituents.
2. With the exception of samples flagged with a* data has been validated as per Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts, Blasland Bouck & Lee, Inc. (approved November 4, 2002 and resubmitted December 10, 2002).
3. NA - Not Analyzed - Laboratory did not report results for this analyte.
4. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
5. Total 2,3,7,8-TCDD toxicity equivalents (TEQs) were calculated using Toxicity Equivalency Factors (TEFs) derived by the World Health Organization (WHO) and published by Van den Berg et al. in Environmental Health Perspectives 106(2), December 1998.

Data Qualifiers:

Organics (volatiles, semivolatiles, dioxin/furans)

- J - Indicates that the associated numerical value is an estimated concentration.
- I - Polychlorinated Diphenyl Ether (PCDPE) Interference.
- R - Data was rejected due to a deficiency in the data generation process.
- X - Estimated maximum possible concentration.
- Y - 2,3,7,8-TCDF results have been confirmed on a DB-225 column.

Inorganics

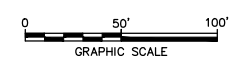
- B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).
- J - Indicates that the associated numerical value is an estimated concentration.



- LEGEND:**
- EMERGENCY EXCAVATION AREA
 - APPROXIMATE RAA BOUNDARY
 - OPEN SOIL/VEGETATED AREA
 - OTHER GROUND-COVERING FEATURE AREA
 - BUILDING/STRUCTURE
 - DEMOLISHED BUILDING
 - EXISTING CONTOUR
 - BUILDING ID
 - UNDERGROUND ELECTRIC LINE
 - ELECTRIC MANHOLE
 - OVERHEAD ELECTRIC LINE
 - LIGHT POLE
 - UTILITY POLE
 - GAS LINE
 - GAS MARKER
 - SANITARY LINE
 - SANITARY MANHOLE
 - STORM SEWER (DRAINAGE) LINE
 - DRAIN MANHOLE
 - CATCH BASIN
 - ABANDONED STORM (DRAINAGE) LINE
 - ABANDONED DRAIN MANHOLE
 - ABANDONED CATCH BASIN
 - WATER LINE
 - WATER VALVE
 - FIRE HYDRANT
 - STEAM LINE
 - EXISTING SOIL SAMPLING LOCATION

NOTE:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
EAST STREET AREA 2-NORTH
POST-WORK NOTIFICATION

**APPROXIMATE LOCATION OF
COMPLETED EMERGENCY EXCAVATION**

ARCADIS Design & Consultancy
for natural and built assets

FIGURE
1